

## SECURITY PROCESSING NOTICE

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### 1. PURPOSE OF THIS NOTICE AND TERMS USED

- 1.1 In order to do business, West African International (Pty) Ltd, and its trading partners (hereinafter referred to as **“we”, ”us”, or “the company”**) in our capacity as a Responsible Party, will have to process Personal Information, and in doing so, will have to comply with a law known as the Protection of Personal Information Act, 4 of 2013 (hereinafter referred to as **“POPIA”**), which regulates and controls the processing of a legal entity’s and/or an individual’s Personal Information in South Africa, (hereinafter referred to as a **“Data Subject”**), which processing includes the collection, use, and transfer of a Data Subject’s Personal Information.
- 1.2 In terms of POPIA, where a Responsible Party processes a Data Subject’s Personal Information, such processing must be done in a lawful, legitimate and responsible manner and in accordance with the provisions, principles and conditions set out under POPIA.
- 1.2 In order to comply with POPIA, a Responsible Party processing a Data Subject’s Personal Information must:
  - 1.2.1 provide the Data Subject with a number of details pertaining to the processing of the Data Subject’s Personal Information, before such information is processed; and
  - 1.2.2 get permission or consent, explicitly or implied, from the Data Subject, to process his / her / its Personal Information, unless such processing:
    - is necessary to carry out actions for the **conclusion or performance of a contract** to which the Data Subject of the Personal Information is a party;
    - is required in order to comply with an **obligation imposed by law**; or
    - is for a **legitimate purpose or is necessary to protect the legitimate interest (s) and/or for pursuing the legitimate interests** of i) the Data Subject; ii) the Responsible Party; or iii) that of a third party to whom the Personal Information is supplied; or
  - is necessary for the proper performance of a **public law duty**.
- 1.3 In accordance with the requirements of POPIA, and because your privacy and trust is important to us, we set out below how we, and more importantly our Security **Department** collects, uses, and shares your Personal Information and the reasons why we need to use and process your Personal Information.

## 2. APPLICATION

This Processing Notice applies to you and all persons who come onto our premises and sites, including reception and waiting rooms, offices, operational areas and facilities, manufacturing areas and parking areas (Company premises).

## 3. WHAT INFORMATION WE NEED

3.1 In order to gain access to the premises, the company has to process the following Personal Information, which pertains to you:

**Your or your employer or organization's contact information**, such as name, alias, address, identity number, passport number, security number, phone number, cell phone number, vehicle make and registration number, social media user ID, email address, and similar contact data, serial numbers of equipment, details regarding the possession of dangerous weapons, your status with an organization, your images and certain biometrics such as finger prints and similar data, which are required for various legitimate interests, and/or lawful reasons.

**Lawfulness – YES**  
**Consent required – NO**

**Specific identifiers**, which are required in order to protect legitimate interests, comply with legal obligations or public legal duties, or in order to accommodate you in our workplaces, such as any disabilities, **certain** biometric information which may be required for access control such as fingerprints and personal details which we may record in relation to alcohol or drug testing, and **health records or related details**.

**This will include:**

- Breathalyzer or blood tests;
- Temperature;
- COVID disclosure.

**Lawfulness – YES**  
**Consent required – NO**

**Children's Information**, all Personal Information collected and processed from any person under the age of eighteen (18) for the purposes of accessing the Xx premises will only be processed with the prior permission of the child's parent or legal guardian, who will be required at all times to accompany such child around the company premises which he or she is given access to.

**Lawfulness – YES**  
**Consent required – NO**

#### **4. PURPOSE FOR PROCESSING YOUR PERSONAL INFORMATION**

4.1 Your personal information will be processed by us for the following purposes:

- to facilitate access into and out of the company premises;
- to ascertain who is entering and leaving the company premises;
- to monitor movements on or in the company premises;
- to ensure a safe working and operating environment;
- to comply with laws, including Security, Health and Safety related laws and legal obligations, including Covid directives.
- to manage security services;
- for the purposes of registering all persons who enter and leave the company premises;
- for the purposes of managing and investigating security incidents; including accidents within the company premises or attention to emergency evacuations; and
- other security measures in general.

**Lawfulness – YES**  
**Consent required – NO**

#### **5. SOURCES OF INFORMATION - HOW AND WHERE DO WE COLLECT YOUR PERSONAL INFORMATION**

5.1 Depending on your requirements, we will collect and obtain Personal Information about you either directly from you.

**6. HOW WE SHARE INFORMATION**

6.1 We share Personal Information for the purposes set out in this Processing Notice with the following categories of recipients:

<p><b>The company employees, fellow directors, trustees, executives, committee members, and affiliates.</b> We may share your Personal Information amongst our employees, directors, trustees, executives, and committee members, for business, legal and operational purposes.</p> <p><b>Lawfulness – YES</b> <b>Consent required – NO</b></p>
<p><b>Business Partners, affiliates and business partners and agents, attorneys.</b> We may share your Personal Information amongst our affiliates and business partners, agents, attorneys and with other third parties for business, legal and operational purposes.</p> <p><b>Lawfulness – YES</b> <b>Consent required – NO</b></p>
<p><b>Third Party Service Providers.</b> We may share your Personal Information with our third-party service providers to perform tasks on our behalf and which are related to our relationship with you.</p> <p><b>Lawfulness – YES</b> <b>Consent required – NO</b></p>
<p><b>IT and Cyber Third-Party Service Providers.</b> We may share your Personal Information with our cyber service providers to perform tasks on our behalf and which are related to our relationship with you.</p> <p><b>Lawfulness – YES</b> <b>Consent required – NO</b></p>
<p><b>Other Disclosures.</b> We may disclose your Personal Information to third parties as part of our Trust related activities, or if we reasonably believe that disclosure of such information is necessary to enforce our objectives or the terms and conditions or other rights including and covered under the Trust Deed and any related policy or procedures, (including investigations of potential violations of our rights), to detect, prevent, or address fraud or security issues, or to protect against harm to the rights, property, or safety of the company, our employees, our directors, trustees, committee members executives, shareholders, stakeholders, or the public.</p> <p><b>Lawfulness – YES</b> <b>Consent required – NO</b></p>

## **7. SECURITY OF INFORMATION**

- 7.1 The security of your Personal Information is important to us. Taking into account the nature, scope, context, and purposes of processing Personal Information, as well as the risks to individuals of varying likelihood and severity, we have implemented technical and organizational measures designed to protect the security of Personal Information. In this regard we will conduct regular audits regarding the safety and the security of your Personal Information.
- 7.2 Your Personal Information will be stored electronically and in some cases in hard copy in files and records, which information, for operational reasons, will be accessible to and or provided to persons employed or contracted by us on a need-to-know basis.
- 7.3 Once your Personal Information is no longer required since the purpose for which the Personal Information was held has come to an end, such Personal Information will be retained in accordance with the Company records retention schedule, which varies depending on the type of processing, the purpose for such processing, the business function, record classes, and record types. We calculate retention periods based upon and reserve the right to retain Personal Information for the periods that the Personal Information is needed to: (a) fulfil the purposes described in this Processing Notice, (b) meet the timelines determined or recommended by regulators, professional bodies, or associations, (c) comply with applicable laws, legal holds, and other legal obligations (including contractual obligations), and (d) comply with your requests.
- 7.4 Notwithstanding the contents housed under clauses 7 and 8, please note that no method of transmission over the Internet or method of electronic storage is 100% secure. Therefore, while we strive to use commercially acceptable measures designed to protect Personal Information, we cannot guarantee its absolute security.

## **8. ACCESS BY OTHERS AND CROSS BORDER TRANSFER**

- 8.1 The company may from time to time have to disclose your Personal Information to other parties, including the company subsidiaries, trading partners, agents, auditors, organs of state, regulatory bodies and/or national governmental, provincial, or local government municipal officials, or overseas trading parties or agents, but such disclosure will always be subject to an agreement which will be concluded as between ourselves and the party to whom we are disclosing your Personal Information to, which contractually obliges the recipient of your Personal Information to comply with strict confidentiality and data security conditions.
- 8.2 Where Personal Information and related data is transferred to a country which is situated outside South Africa, your Personal Information will only be transferred to those countries which have similar data privacy laws in place or where the recipient of the Personal Information concludes an agreement which contractually obliges the recipient to comply with strict confidentiality and data security conditions and which in particular will be to a no lesser set of standards than those imposed by POPIA.

## **9. YOUR RIGHTS**

- 9.1 You as a Data Subject have certain rights, which are detailed below:

- **The right of access** - You may ask the company (free of charge) to confirm that we hold your Personal Information, or ask us to provide you with details, (at a fee) on how we have processed your Personal Information, which request must be done by following the process set out under The company PAIA Manual.
- **The right to rectification** - You have the right to ask us to update or rectify any inaccurate Personal Information which we hold of yours, which can be done by accessing the update / rectification request.
- **The right to object to and restrict further processing** - Where we do not need your consent to process your Personal Information, but you are not in agreement with such processing, you may lodge an objection to such processing by accessing the objection request.
- **The right to withdraw consent** - Where you have provided us with consent to process your Personal Information, you have to right to subsequently withdraw your consent, which can be done by accessing the withdrawal of consent request.

9.2 These rights may be exercised by using the relevant forms housed on The company Website at: <https://westafricangroup.co.za/legal-privacy/> .

## 10. CHANGES TO THIS PRIVACY STATEMENT

- 10.1 As The company changes over time, this Processing Notice is expected to change as well.
- 10.2 The company reserves the right to amend the Processing Notice at any time, for any reason, and without notice to you other than the posting of the updated Processing Notice on the company Website.
- 10.3 We therefore request that you to visit our website frequently in order to keep abreast with any changes.

## 11. PROCESSING OTHER PERSONS' PERSONAL INFORMATION

- 11.1 If you process another's Personal Information on the company's behalf, or which we provide to you in order to perform your contractual or legal obligations or to protect any legitimate interest, you will
- if you are processing such Personal Information as our Operator as defined under POPIA, process all and any such Personal Information in compliance with the obligations set out under our standard "Operator Agreement" housed on our website; or
  - where not acting as an Operator, nonetheless, keep such information confidential and secure as per POPIA and you will not, unless authorized to do so, process, publish, make accessible, or use in any other way such Personal Information unless in the course and scope of your duties, and only for the purpose for which the information has been received and granted to you, and related to the duties assigned to you.

## 12. COMPLAINTS OR QUERIES - CONTACT US

- 12.1 Any comments, questions or suggestions about this Processing Notice or our handling of your Personal Information should be emailed to our Information or Deputy Information officers at the details housed below.

**Information Officer**

**Deputy Information Officer**

- 12.2 Should you wish to discuss a complaint, please feel free to contact us using the details provided above. All complaints will be treated in a confidential manner.
- 12.3 Our offices are open 9:00 am – 4.00 pm GMT, Monday to Friday.
- 12.4 Should you feel unsatisfied with our handling of your Personal Information, or about any complaint that you have made to us, you are entitled to escalate your complaint to the South African, Information Regulator who can be contacted at <<https://www.justice.gov.za/inforeg/>>.

**13. ACCEPTANCE AND BINDING NATURE OF THIS DOCUMENT**

- 13.1 By providing the company with the Personal Information which we require from you as listed under this Processing Notice:
- you acknowledge that you understand why your Personal Information needs to be processed;
  - you accept the terms which will apply to such processing, including the terms applicable to the transfer of such Personal Information cross border;
  - where consent is required for any processing as reflected in this Processing notice, you agree that we may process this particular Personal Information.
- 13.2 Where you provide us with another person's Personal Information for processing, you confirm that that you have obtained the required permission from such person(s) to provide us with their Personal Information for processing.
- 13.3 The rights and obligations of the parties under this Processing Notice will be binding on, and will be of benefit to, each of the parties' successors in title and/or assigns where applicable.
- 13.4 Should any of the Personal Information concern or pertain to a legal entity whom you represent, you confirm that you have the necessary authority to act on behalf of such legal entity and that you have the right to provide the Personal Information and/or the required permissions in respect of the processing of that Organization or entities' Personal Information.